

February 17, 2023

Via ECF

Hon. Victor Marrero
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Tecku, et al. v YieldStreet, Inc., et al.*, No. 1:20-cv-07327 (VM)

Dear Judge Marrero:

Pursuant to Section 6 of the Court's Electronic Case Filing Rules & Instructions, Plaintiff Lawrence Tjok ("Plaintiff") hereby files this Letter Motion seeking leave to file under seal: (i) certain exhibits submitted in Support of Plaintiff's Motion for Class Certification; and (ii) Plaintiff's Memorandum of Law, which refers to those exhibits in detail.

Specifically, this Motion seeks to seal Plaintiff's Exhibits 4-5; 12-23; 25-26; 29-31; and 33, all of which are attached to the Declaration of Daniel Centner to be submitted in support of Plaintiff's Motion for Class Certification, as well as the portions of Plaintiff's Memorandum of Law referring to the contents of those Exhibits.

The exhibits that Plaintiff seeks to seal were produced by Defendants, and/or by non-Party Four Wood Capital Advisers, LLC ("Four Wood"), as "confidential" or "highly confidential" in accordance with the parties' protective order(s) previously entered in this case. *See* ECF Nos. 69, 73. Because these exhibits and the Memorandum discussing those exhibits are being filed today, the producing parties have not yet had the opportunity to review and consider whether they want to seek to have those documents permanently sealed.

In accordance with the foregoing, Plaintiff now files this Motion seeking to seal the above-referenced documents. Prior to filing this Motion, Plaintiff conferred with Defendants, who requested that they be afforded one week from today, or until Friday February 24, 2023, to review the exhibits and file a letter addressing whether and/or which documents it believes should remain under seal. Plaintiffs will also notify non-party Four Wood of this filing to ensure that Four Wood is afforded the same opportunity.

Pending the Court's determination, Plaintiff requests that all parties to this case be given full access to the documents sought to be sealed. Plaintiff, under separate cover, will provide unredacted copies of all documents to Defendants and the Court simultaneously with this filing.

WHEREFORE, Plaintiff respectfully requests/moves the Court for leave to file the aforementioned confidential materials under seal, and further requests that Defendants and Four Wood be given until Friday, February 24, 2023 (or later as the Court deems necessary) to provide this Court specific reasons for keeping such exhibits under seal.

Respectfully submitted,

By: /s/ Daniel Centner

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of February, 2023, a copy of the foregoing was served on all counsel of record through operation of the Court's CM/ECF filing system.

/s/Daniel Centner